

We need to support more decentralization and protect the local interests and influence of public broadcasting.

I used to own 20% of five network TV stations in Oregon and Idaho, in the 70's and 80's. I haven't paid much attention since I sold out around '87.

What appears to be happening is caused by what I predicted would happen way back then--excessive competition (from cable, satellite TV, "Super Stations"... ) and a dumbing down process. A network TV station used to be almost a "licensed monopoly". We were allowed to own no more than five stations in any market and a TV station owner couldn't also own another radio station or newspaper in the same market. Cable was a non-factor. I don't know if you've been reading about it, but it's frightening to me what is happening with the huge corporate communication companies (like Clear Channel, Murdock, ABC/Disney...) gaining almost complete control of the press.

It was considered that the airwaves (frequencies) were owned by the public and should be used for the public good. This required public regulation because it was pretty well understood that the self-interest profit motive of the free market would often be in conflict with the public good. We, the station owners didn't like this, or at least in our board meetings, the talk was often complaining about government interference in our business. We had DC law firms on full retainers (as did every TV station owner in the country) lobbying to loosen the regulations. In their worship of, and quest for, growth, station owners have created a situation which to me now violates the public good. Competition has been decreased as more and more of the press/communication ownership is centralized. The lobbying to loosen the regulations, and pouring of huge amounts of money into that effort, was successful.

And now we have situations like the one in Iowa (I believe it was) where there was a local tornado that was approaching the community and the local weathermen called the local station to get the news out to the residents. The problem was that it was a Clear Channel station. There was no one at the station. It was run remotely from Chicago. People died...

I still have many friends in the entertainment business (song writers, recording artists...). They all tell me how difficult it is to get their

music listened to, sold, recorded, marketed... All because of the "conglomeratizing"--ignoring of the diversity and local interests.

In my day, we needed to pay close attention to what the local market desired, and demanded. There was uniqueness in each market. What would be of interest to viewers in Eugene, Oregon, would be very different from Boise, Idaho. We would program differently for each market. Our news would have different priorities and emphasis in different markets...

More and more of the programming decisions today are now made farther and farther from the local markets. The result is what we're seeing--an appeal to the masses--to the "C and D students" of the country. The middle of the bell curve. Average. "Normal". The Eugene's and Boise's of the country are lumped together such that the discerning viewers unique interests are ignored. It's a numbers game. What would rate high in a small local market wouldn't rate high in a combined market. To maintain the (relative) ratings in the appeal to a larger homogenized market meant programming for the middle of the bell curve (dumbing down). I say relative ratings, because no show today has the ratings of any show of 25 - 35 years ago. At one time 50% of the TV sets turned on were tuned into Happy Days. Today they think 15% is good.

What I'm saying is, Fox is doing a better job of appealing to the middle of the bell curve (the "dumber market"). More and more of the thinking, more sophisticated and "smarter" folks are doing other things besides watching news on TV. They get their information (and entertainment) elsewhere now.

I may not have done the best job of explaining the evolution here, but it has unfolded as I thought it would way back around 1975 when I attempted to convince the rest of our stockholders to sell the stations because of what I saw coming--the influence of, and therefore value of, a network license was going to diminish. I was right. I sold my interest. A little too soon however, as the network stations continued to grow more valuable for quite a few more years.

Please help protect local and diverse radio by adopting the proposal described in MM Docket No. 95-31 to limit the number of applications for the NCE FM New Station Applications in the October 2007 filing window.

By limiting the number of applications from any single entity, the FCC will protect local voices and make sure these new stations serve local communities. The Commission's mandate to foster localism and diversity will be advanced by encouraging wider pool of local applicants.

I strongly urge you to adopt the proposal described in MM Docket No. 95-31 to limit any single entity to 10 applications for the new noncommercial licenses.